

**UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT  
717 MADISON PLACE, N.W., WASHINGTON D.C. 20439**

**CASE NO.: 16-1703**  
***Trademark Trial and Appeals Board (Opposition 91197060)***

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**EMERALD CITIES COLLABORATIVE, INC. (ECC)  
Opposer/Counterclaim Defendant – Appellant**

**RECEIVED**

**v.**

**SHERI JEAN ROESE (ROESE)  
Applicant/Counterclaim Plaintiff – Appellee**

**JUN 01 2016**

**United States Court of Appeals  
For The Federal Circuit**

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**MOTION FOR EXTENSION**

At the recommendation of the Court Clerk's Office, this Motion is to request the Court to grant me extension of time to in order to respond to Counterclaim Defendant/Appellant's Brief. Being that the Court previously rejected my informal response as being premature, I realize that I need the help of an attorney in order to prepare a proper response for the Court.

Considering that from 2011-2015, I did successfully represent myself Pro Se in the Trademark Trial and Appeals Board (Opposition 91197060), it's that I was forced to for reasons of financial hardship through that protracted litigation. Without oral argument, in December of 2015 I am fortunate that judgment was rendered in favor of my Counterclaim against Appellant. Having prevailed against Appellant on a clear violation of Law, I now have the opportunity to be represented Pro Bono by a Washington DC attorney in the Federal Circuit. I would like to do this if possible, as I cannot possibly respond as Pro se to Appellant's Brief with the time allowed.

Representation would also preserve my right to oral argument, which I was not afforded the opportunity to do in the case previously won which is now being appealed.

**With less than 30 days left, this to respectfully request the court's extension of time in order that I may seek counsel before I submit my final Brief. Thank you.**



**Sheri Jean Roese, Appellee  
34522 N. Scottsdale Road, Ste 637  
Scottsdale, Arizona 85266**

**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing **MOTION FOR EXTENSION** upon Counterclaim Defendant/Appellant, by depositing a copy thereof in the United States Mail on May 31, 2016 addressed as follows:

Lawrence E. James  
Joshua W. Newman  
Reed Smith LLP  
**10 South Wacker Drive, 40th Floor**  
Chicago, IL 60606-7507



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CASE # 16-1703

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Form  
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## 4 Express Package Service

\* To most locations.  
NOTE: Service order has changed. Please select carefully.Packages up to 150 lbs.  
For packages over 25 lbs. use the new  
FedEx Express Freight US Airbill.

## Next Business Day

 FedEx First Overnight  
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx Priority Overnight  
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx Standard Overnight  
Next business afternoon. Saturday Delivery NOT available.

## 2 or 3 Business Days

 FedEx 2Day A.M.  
Second business morning. Saturday Delivery NOT available. FedEx 2Day  
Second business afternoon. Thursday shipment will be delivered on Monday unless SATURDAY Delivery is selected. FedEx Express Saver  
Third business day. Saturday Delivery NOT available.

## 5 Packaging \* Delivered within limit 3000.

 FedEx Envelope\* FedEx Pak\* FedEx Box FedEx Tube Other

## 6 Special Handling and Delivery Signature Options

 SATURDAY Delivery  
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver. No Signature Required  
Package may be left without obtaining a signature for delivery. Direct Signature  
Someone at recipient's address may sign for delivery. See options. Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential delivery only. See applies.

## Does this shipment contain dangerous goods?

One box must be checked.

<input type="checkbox"/> No	<input type="checkbox"/> Yes As per attached Shipper's Declaration.	<input type="checkbox"/> Yes Shipper's Declaration not required.	<input type="checkbox"/> Dry Ice Dry ice, 8, UN 1445 _____ kg
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.			<input type="checkbox"/> Cargo Aircraft Only

## 7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.   
 Sender  
Acct. No. in Section 1 will be billed.  Recipient  Third Party  Credit Card  Cash/Check

Total Packages

Total Weight

Credit Card Auth.

Obtain recip.  
Acct. No.